

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

PATRICIA KEECH and DAVID NEWFIELD,)
on behalf of themselves and all others similarly)
situated,)
Plaintiffs,) Case No.: 18-cv-00683-JRT-HB
vs.)
SANIMAX USA, LLC,) CLASS ACTION
Defendant.)

DECLARATION OF JEFFREY S. STORMS

I, Jeffrey S. Storms, solemnly affirm as follows:

1. I am over 18 years old and I am one of Plaintiffs' attorneys in the above-captioned matter.
2. I make this Declaration in support of Plaintiffs' Motion to Preliminarily Approve Class Action Settlement.
3. Attached hereto as Exhibit 1 is a true and correct copy of an August 6, 2019 Settlement Agreement, which contains Exhibits A through H attached thereto.
4. The Exhibits to Exhibit 1 are as follows:
 - a. Exhibit A – First Amended Complaint
 - b. Exhibit B – Class Area Map
 - c. Exhibit C – List of Resident Data Sheet Respondents
 - d. Exhibit D – Class Notice
 - e. Exhibit E – Claim Form

f. Exhibit F – [proposed] Preliminary Approval Order

g. Exhibit G – [proposed] Order and Final Judgment

h. Exhibit H – Destruction Certificate

5. Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that everything stated in this document is true and correct and that this Declaration was executed on August 9, 2019 in Hennepin County, Minnesota.

FURTHER YOUR DECLARANT SAYETH NOT.

/s/ Jeffrey S. Storms
Jeffrey S. Storms, #0387240